

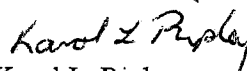
ACTION MEMORANDUM
ORDNANCE AND EXPLOSIVES (OE)
TIME CRITICAL REMOVAL ACTION (TCRA)
SWMU 40 (AED TEST RANGE)
TOOELE ARMY DEPOT, TOOELE, UTAH

1. The purpose of this Action Memorandum is to justify the need for, detail, and explain the rationale for a Time Critical Removal Action (TCRA), proposed for a 91-acre area of property on the Tooele Army Depot, in Tooele County, Utah. Solid Waste Management Unit (SWMU) 40, the AED Test Range, is located on the active installation. Tooele Army Depot is authorized to respond under the Defense Environmental Restoration Program (DERP) and the National Contingency Plan (NCP) where substantial and imminent Ordnance and Explosive (OE) hazards exist.
2. Tooele Army Depot is currently on the National Priorities List (NPL). SWMU 40 is located in the northwest portion of the installation. The area consists of approximately 91 acres and contains several bermed revetments, a drop tower, and an observation bunker. Due to delays in funding, the site, including any OE hazards, is currently accessible to military personnel. Since funding will not be available for a year or more and with the influx of new military personnel at Tooele Army Depot who may be unaware of the dangers at this site, the risk of injury to personnel and equipment is increasing. Immediate action is required because the possibility exists for serious injury to anyone entering the site without appropriate precautions. Serious injury, death, and/or destruction of property may occur if the removal action described in this Action Memorandum is not performed.
3. SWMU 40 had been characterized during the Remedial Investigation/Feasibility Study (RI/FS) process (although the Feasibility Study has not been finalized) and the recommended remedy is excavation and off-post treatment and disposal of contaminated soil. The site has been used extensively for a wide range of ordnance testing activities, ranging from detonation of 1-ton bombs to small munitions and also including the testing of rocket motors. The former furnace building was used to test conveyor spacing for the deactivation furnace. More than 20 bomb craters are located in the northern portion of the test range. Previously at the site, numerous OE items were identified. The most frequently encountered were 90-mm heat rounds, 40-mm projectiles, and M43A1 bomblets. Seven live items were identified and destroyed during field activities associated with the RI in 1995. Currently, the site is waiting for finalization of the Feasibility Study and to proceed with the Record of Decision (ROD) and recommended remedy of excavation and off-post treatment and disposal contaminated soil.
4. Current and ongoing regulatory authority for this site is provided by Mr. Jim Kiefer, Region VIII, U.S. Environmental Protection Agency (USEPA), and Mr. Rik Ombach, State of Utah, Department of Environmental Quality, Division of Environmental Response and Remediation. The USEPA is the lead agency for this site.
5. The action proposed for this site is fencing to prevent unauthorized entry onto the site. The fence will contain signs approximately every 100 feet to ensure good visibility to troops on patrol. This action will prevent personnel and equipment from coming in contact with the OE hazards at the site until such time that the recommended remedy can be performed. During the RI/FS process, numerous remedies were identified for SWMU 40. However, without sufficient funding, performing a TCRA for fencing is the only remedy that is appropriate for

implementation in the short-term. While the installation of a fence at this site does not contribute to the long-term remediation at the site (implementing the recommended remedy), the fence can also be utilized during construction to prevent unauthorized access during construction. The administrative record for this action will be included in the administrative record for Tooele Army Depot, already in existence at Tooele City Public Library in Tooele, Utah, and the Marriott Library at the University of Utah in Salt Lake City, Utah. The estimated cost of this TCRA is \$120,000. Fieldwork for this TCRA is scheduled to begin 3 November and last approximately 2-3 weeks.

6. Applicable or Relevant and Appropriate Requirements (ARARs) that may apply to SWMU 40 at Tooele Army Depot include: Fugitive Dust Control (UAC R307-101), Fugitive Emissions and Fugitive Dust applicable to Tooele County (R307-205), Archaeological and Historic Preservation (16 USC Sec 469 UCA, Title 9 Chapter 8; UAC R212), and Emissions Standards (UAC R201-1).
7. The US Army is the sole responsible party for this site and is responsible for implementation of this TCRA.
8. Based on the above facts, and in consultation with interdisciplinary support from the U.S. Army Corps of Engineers and appropriate external coordination, I have determined that an imminent and substantial risk exists at SWMU 40, Tooele Army Depot, Tooele, Utah, and recommend a TCRA to address the situation. This decision document represents the selected removal action for SWMU 40, Tooele Army Depot, Tooele County, Utah, developed in accordance with CERCLA as amended, and not inconsistent with the NCP. This decision is based on the administrative record for this site.

Sincerely,



Karol L. Ripley
LTC, OD
Commanding

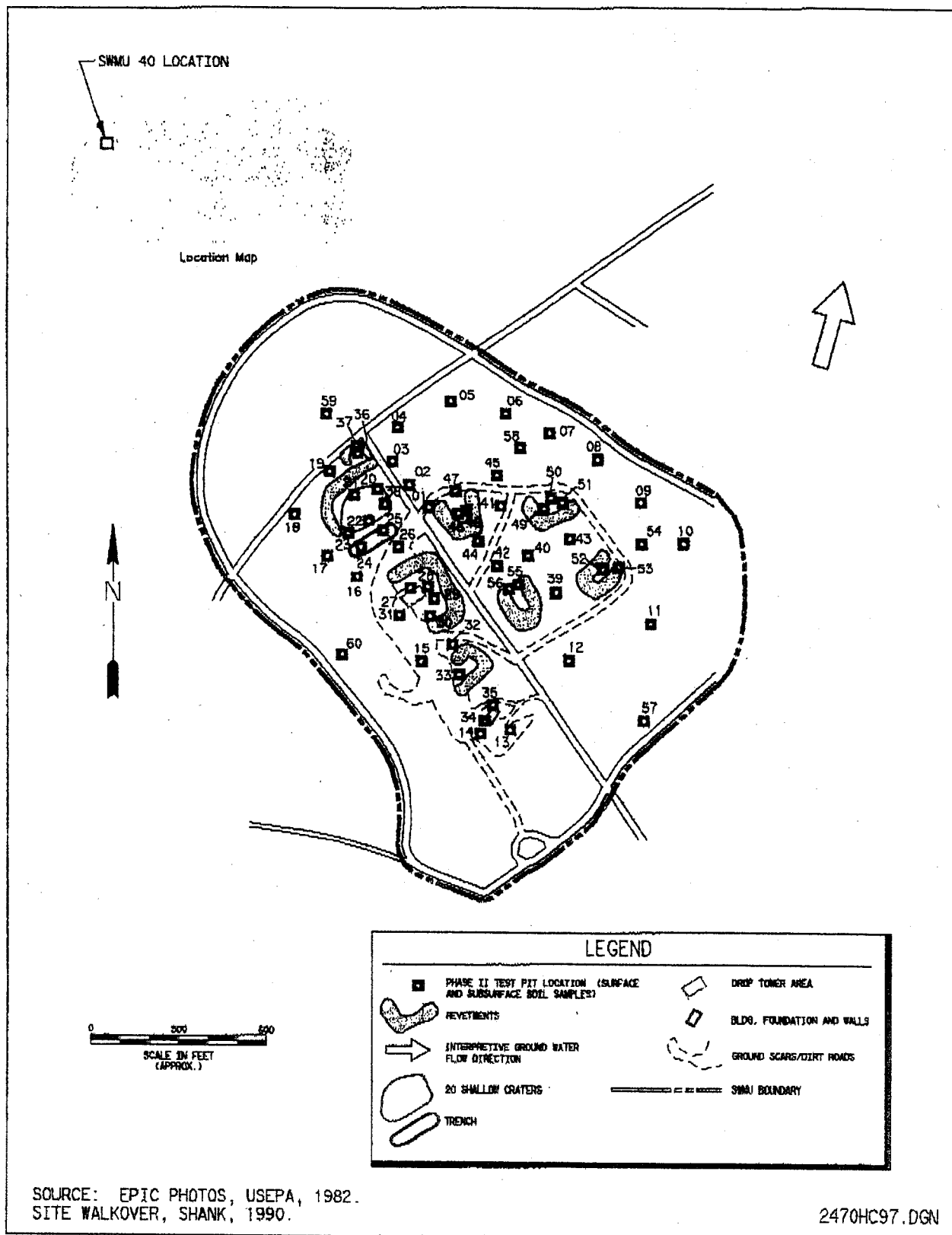


Figure 6-10. SWMU 40 Phase II Test Pit Sample Locations